

# EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO,  
et al.,

*Plaintiffs,*

v.

THE STATE OF TEXAS, et al.,

*Defendants.*

§  
§  
§  
§  
§  
§  
§  
§  
§  
§  
§

Consolidated Case No. 5:21-CV-0844-XR

---

***LUPE, OCA-GREATER HOUSTON, HAUL, LULAC, AND MI FAMILIA VOTA*  
PLAINTIFFS’ SUPPLEMENTAL RULE 26(a)(1) INITIAL DISCLOSURES**

Pursuant to Federal Rule of Procedure 26(a)(1), and the Court’s November 18, 2021 Order, ECF NO. 125, the *LUPE, OCA-GREATER HOUSTON, HAUL, LULAC*, and *MI FAMILIA VOTA* Plaintiffs (“Plaintiffs”) make the following supplemental disclosures:

**I. Supplemental Initial Disclosure Qualifications**

These supplemental disclosures are made upon information presently known to Plaintiffs and without prejudice to Plaintiffs’ right to produce during discovery or at trial such data, information or documents as are: (a) subsequently discovered; (b) subsequently determined to be relevant for any purpose; or (c) subsequently determined to have been omitted from this and any supplemental disclosure statements. By making these disclosures, Plaintiffs do not represent that they are identifying every document, tangible thing, or witness that may be relevant to the issues in this lawsuit, or on which Plaintiffs may rely in support of their claims or defenses. Nor do Plaintiffs waive their rights to object to the disclosure of any person, document, or thing on the basis of any applicable privilege, the work product doctrine, relevancy, competency, materiality, undue burden, hearsay, or any other valid objection in response to any discovery request or

proceeding in this case. Further, Plaintiffs reserve all rights to present at trial or other hearing in this matter additional witnesses and evidence not presently identified or encompassed by these disclosures, and to present any rebuttal or impeachment evidence they deem appropriate.

## **II. Supplemental Initial Disclosures Pursuant to Fed. R. Civ. P. 26(a)(1)**

### **A. The name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(i))**

As indicated in the First Amended Initial Disclosures, Dana DeBeauvoir remains likely to have discoverable information that Plaintiffs may use to support their claims. However, as Ms. DeBeauvoir is no longer the Travis County Clerk, Plaintiffs additionally identify Defendant Rebecca Guerrero, current Travis County Clerk, as a person likely to have discoverable information that Plaintiffs may use to support their claims. Defendant Guerrero is likely to have knowledge of facts related to the passage, implementation, and impact of SB1, and voter registration, election administration, and voting history in Travis County. Furthermore, Plaintiffs intend to depose Defendant Guerrero.

In addition to the persons identified in Plaintiffs' previous disclosures, the following individuals are likely to have discoverable information that Plaintiffs may use to support their claims and/or defenses, not including information to be used solely for impeachment.

#### **1. Pamela Gaskin, on behalf of Plaintiff League of Women Voters of Texas.**

Ms. Gaskin may be contacted through the Texas Civil Rights Project, 1405 Montopolis Drive, Austin, TX 78741, (512) 474-5073. Ms. Gaskin is a member of the League of Women Voters of Texas and will likely have discoverable information regarding the impact of SB 1 on voters who seek to cast absentee ballots by mail.

**2. Amatullah Contractor, on behalf of Plaintiffs OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, and Workers Defense Action Fund.**

Ms. Contractor may be contacted through the Asian American Legal Defense and Education Fund, 99 Hudson Street, 12th Floor, New York, NY 10013, (212) 966-5932. Ms. Contractor will likely have discoverable information regarding voter assistance and the impact of SB 1 on voter assistance.

**3. Hyunja Norman, on behalf of Plaintiffs OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, and Workers Defense Action Fund.**

Ms. Norman may be contacted through the Lawyers' Committee for Civil Rights Under Law, 1500 K Street, Suite 900, Washington, DC 20005, (202) 662-8600. Ms. Norman will likely have discoverable information regarding voter assistance and the impact of SB 1 on voter assistance.

**4. Rogene Gee Calvert, on behalf of Plaintiff OCA-Greater Houston.**

Ms. Calvert may be contacted through the Asian American Legal Defense and Education Fund, 99 Hudson Street, 12<sup>th</sup> Floor, New York, NY 10013, (212) 966-5932. Ms. Calvert is a member of OCA-Greater Houston and a voter with disabilities who will likely have discoverable information regarding the impact of SB 1 on voters who seek to cast absentee ballots by mail.

**5. Yi Lu Zhao, on behalf of Plaintiffs OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, and Workers Defense Action Fund.**

Mr. Zhao may be contacted through the Asian American Legal Defense and Education Fund, 99 Hudson Street, 12<sup>th</sup> Floor, New York, NY 10013, (212) 966-5932. Mr. Zhao will likely have discoverable information regarding the impact of SB 1 on voters who seek to cast absentee ballots by mail.

**6. Ming Fei Zhao, on behalf of Plaintiffs OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, and Workers Defense Action Fund.**

Ms. Zhao may be contacted through the Asian American Legal Defense and Education Fund, 99 Hudson Street, 12<sup>th</sup> Floor, New York, NY 10013, (212) 966-5932. Ms. Zhao will likely have discoverable information regarding voter assistance and the impact of SB 1 on voter assistance.

**7. Chanda Parbhoo, on behalf of Plaintiffs OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, and Workers Defense Action Fund.**

Ms. Parbhoo may be contacted through the Asian American Legal Defense and Education Fund, 99 Hudson Street, 12<sup>th</sup> Floor, New York, NY 10013, (212) 966-5932. Ms. Parbhoo will likely have discoverable information regarding the impact of SB 1 on voters who seek to cast absentee ballots by mail.

**8. Riazuddin Ahmed, on behalf of Plaintiffs OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, and Workers Defense Action Fund.**

Mr. Ahmed may be contacted through the Asian American Legal Defense and Education Fund, 99 Hudson Street, 12<sup>th</sup> Floor, New York, NY 10013, (212) 966-5932. Mr. Ahmed is a voter with disabilities who will likely have discoverable information regarding the impact of SB 1 on voters who seek to cast absentee ballots by mail.

**9. Julie Espinoza, on behalf of Plaintiffs League of Women Voters of Texas and REVUP-Texas.**

Ms. Espinoza may be contacted through Disability Rights Texas, 2222 West Braker Lane, Austin, TX 78758. Ms. Espinoza is a member of both the League of Women Voters of Texas and of REVUP-Texas and will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

**10. Wendy Salome, on behalf of *HAUL* Plaintiffs.**

Ms. Salome may be contacted through counsel for the *HAUL* plaintiffs. Ms. Salome will likely have discoverable information regarding the conduct of poll watchers during the 2020 elections.

**11. Jennifer Martinez on behalf of *HAUL* Plaintiffs.**

Ms. Martinez may be contacted through counsel for the *HAUL* plaintiffs. Ms. Martinez is the Chief Executive Officer for Plaintiff The Arc of Texas. Ms. Martinez will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

**12. Ashley Ford on behalf of *HAUL* Plaintiffs.**

Ms. Ford may be contacted through counsel for the *HAUL* plaintiffs. Ms. Ford is the Director of Policy and Advocacy for Plaintiff The Arc of Texas. Ms. Ford will likely have discoverable information regarding the impact of SB 1 on voters with disabilities who seek to cast absentee ballots by mail or need assistance in voting.

13. Individuals with knowledge include all legislators who served on the House and Senate Committees that considered SB1 and its predecessor bills in the 87<sup>th</sup> Texas Regular and Special legislative sessions (HB3, HB6 and SB7) as well as legislators who offered amendments to SB1, HB3, HB6, and SB7 as the bills moved through the 87<sup>th</sup> Texas Regular and Special legislative sessions.

14. Individuals with knowledge include all parties in the cases consolidated with the instant suit and all individuals who have been previously disclosed or will be disclosed by the parties in these consolidated cases, including but not limited to the disclosures in Dkt. 102.

- B. A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment (Fed. R. Civ. P. 26(a)(1)(A)(ii))**

Plaintiffs make no supplements to the First Amended Initial Disclosures with respect to the documents in their possession, custody, or control.

- C. A computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered (Fed. R. Civ. P. 26(a)(1)(A)(iii))**

Plaintiffs do not seek damages in this action; however, Plaintiffs intend to seek recovery of attorneys' fees and costs incurred in this litigation.

Dated April 18, 2022

Respectfully submitted,

/s/ Jasleen K. Singh

Sean Morales-Doyle

Eliza Sweren-Becker\*

Patrick A. Berry\*

Andrew B. Garber\*

Jasleen K. Singh\*

BRENNAN CENTER FOR JUSTICE AT  
NYU SCHOOL OF LAW

120 Broadway, Suite 1750

New York, New York 10271

Telephone: (646) 292-8310

Facsimile: (212) 463-7308

sean.morales-doyle@nyu.edu

eliza.sweren-becker@nyu.edu

patrick.berry@nyu.edu

andrew.garber@nyu.edu

jasleen.singh@nyu.edu

Paul R. Genender

Texas State Bar No. 00790758

Elizabeth Y. Ryan

Texas State Bar No. 24067758

Matthew Berde\*  
Texas State Bar No. 24094379  
Megan Cloud  
Texas State Bar No. 24116207  
WEIL, GOTSHAL & MANGES LLP  
200 Crescent Court, Suite 300  
Dallas, Texas 75201  
Telephone: (214) 746-8158  
Facsimile: (214)746-7777  
Liz.Ryan@weil.com  
Paul.Genender@weil.com  
Matt.Berde@weil.com  
Megan.Cloud@weil.com

Alexander P. Cohen\*  
Texas State Bar No. 24109739  
WEIL, GOTSHAL & MANGES LLP  
767 Fifth Avenue  
New York, New York 10153

*Counsel for Plaintiffs Friendship-West  
Baptist Church, Anti-Defamation League  
Austin, Southwest, and Texoma Regions,  
Texas Impact, and James Lewin*

Nina Perales  
Julia R. Longoria  
MEXICAN AMERICAN LEGAL  
DEFENSE AND  
EDUCATIONAL FUND  
110 Broadway, Suite 300  
San Antonio, Texas 78205  
Telephone: (210) 224-5476  
Facsimile: (210) 224-5382  
nperales@maldef.org  
jlongoria@maldef.org

Michael C. Keats\*  
Rebecca L. Martin\*  
Jason S. Kanterman\*  
Kevin Zhen\*  
FRIED, FRANK, HARRIS, SHRIVER &  
JACOBSON LLP  
One New York Plaza  
New York, New York 10004  
Telephone: (212) 859-8000

Facsimile: (212) 859-4000  
michael.keats@friedfrank.com  
rebecca.martin@friedfrank.com  
jason.kanterman@friedfrank.com  
kevin.zhen@friedfrank.com

*Counsel for Plaintiffs La Unión del Pueblo  
Entero, Southwest Voter Registration  
Education Project, Mexican American Bar  
Association of Texas, Texas Hispanics  
Organized for Political Education, Jolt  
Action, William C. Velasquez Institute, and  
Fiel Houston, Inc.*

Kenneth E. Broughton  
Texas Bar No. 03087250  
kbroughton@reedsmith.com  
J. Keely Dulaney\*  
Texas Bar No. 24116306  
kdulaney@reedsmith.com  
Reed Smith LLP  
811 Main Street, Suite 1700  
Houston, Texas 77002-6110  
Telephone: (713) 469-3800  
Facsimile: (713) 469-3899

Sarah Cummings Stewart  
Texas Bar No. 24094609  
Reed Smith LLP  
2850 N. Harwood Street, Suite 1500  
Dallas, Texas 75201  
Telephone: (469) 680-4200  
Facsimile: (469) 680-4299  
sarah.stewart@reedsmith.com

Danielle Ahlrich  
Texas Bar No. 24059215  
401 Congress Avenue, Suite 1800  
Austin, Texas 78701  
Telephone: (512) 623-1777  
dahlrich@reedsmith.com

Kathryn Sadasivan\*  
Amir Badat\*  
Liliana Zaragoza\*  
Ciara A. Sisco\*

NAACP Legal Defense and Educational  
Fund, Inc.  
40 Rector Street, 5th Floor  
New York, New York 10006  
Telephone: (212) 965-2200  
Facsimile: (212) 226-7592  
ksadasivan@naacpldf.org  
abadat@naacpldf.org  
lzaragoza@naacpldf.org  
csisco@naacpldf.org

Jennifer A. Holmes\*  
Georgina Yeomans\*  
R. Gary Spencer\*+  
NAACP Legal Defense and Educational  
Fund, Inc.  
700 14th Street NW, Suite 600  
Washington, DC 20005  
Telephone: (202) 682-1300  
Facsimile: (202) 682-1312  
jholmes@naacpldf.org  
gyeomans@naacpldf.org  
gspencer@naacpldf.org

Shira Wakschlag\*  
The Arc of the United States, Inc.  
1825 K Street, NW, Suite 1200  
Washington, DC 20006  
Telephone: (202) 534-3708  
Facsimile: (202) 534-3731  
Wakschlag@thearc.org

*Counsel for Plaintiffs Houston Area Urban  
League; Delta Sigma Theta Sorority, Inc.;  
The Arc of Texas; and Jeffrey Lamar  
Clemmons*

Mimi M.D. Marziani  
Texas Bar No. 24091906  
Hani Mirza  
Texas Bar No. 24083512  
Zachary Dolling  
Texas Bar No. 24105809  
Sarah Chen\*  
TEXAS CIVIL RIGHTS PROJECT  
1405 Montopolis Drive

Austin, Texas 78741  
512-474-5073 (Telephone)  
512-474-0726 (Facsimile)  
mimi@texascivilrightsproject.org  
hani@texascivilrightsproject.org  
zachary@texascivilrightsproject.org  
schen@texascivilrightsproject.org

Thomas Buser-Clancy  
Texas Bar No. 24078344  
Savannah Kumar  
Texas Bar No. 24120098  
Ashley Harris  
Texas Bar No. 24123238  
Andre Segura  
Texas Bar No. 24107112  
ACLU FOUNDATION OF TEXAS, INC.  
5225 Katy Freeway, Suite 350  
Houston, Texas 77007  
Telephone: (713) 942-8146  
Fax: (915) 642-6752  
tbuser-clancy@aclutx.org  
skumar@aclutx.org  
aharris@aclutx.org  
asegura@aclutx.org

Adriel I. Cepeda Derieux\*  
Ari Savitzky\*  
Sophia Lin Lakin\*  
Samantha Osaki\*  
Susan Mizner\*  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
125 Broad St., 18th Floor  
New York, New York 10004  
Telephone: (212) 284-7334  
acepedaderieux@aclu.org  
asavitzky@aclu.org  
slakin@aclu.org  
sosaki@aclu.org  
smizner@aclu.org  
AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
39 Drumm St.  
San Francisco, California 94111  
Telephone: (415) 343-0781

LIA SIFUENTES DAVIS  
Texas State Bar No. 24071411  
LUCIA ROMANO  
Texas State Bar No. 24033013  
LISA SNEAD  
Texas State Bar No. 24062204  
DISABILITY RIGHTS TEXAS  
2222 West Braker Lane  
Austin, Texas 78758-1024  
Telephone: (512) 454-4816  
Fax: (512) 454-3999  
ldavis@drtx.org  
lromano@drtx.org  
lsnead@drtx.org

Jerry Vattamala\*  
Susana Lorenzo-Giguere\*  
Patrick Stegemoeller\*  
ASIAN AMERICAN LEGAL DEFENSE  
AND EDUCATION FUND  
99 Hudson Street, 12th Floor  
New York, New York 10013  
Telephone: (212) 966-5932  
Fax: (212) 966 4303  
jvattamala@aaldef.org  
slorenzo-giguere@aaldef.org  
pstegemoeller@aaldef.org

Jessica Ring Amunson\*  
Urja Mittal\*  
JENNER & BLOCK LLP  
1099 New York Ave. NW, Suite 900  
Washington, DC 20001  
Telephone: (202) 639-6000  
jamunson@jenner.com  
umittal@jenner.com

Sophia Cai\*  
JENNER & BLOCK LLP  
455 Market St. Suite 2100  
San Francisco, California 94105  
scai@jenner.com

*Counsel for Plaintiffs OCA-Greater  
Houston, League of Women Voters of Texas,*

*REVUP-Texas, and Workers Defense Action  
Fund*

Wendy J. Olson\*  
Laura E. Rosenbaum\*  
Elijah Watkins\*  
Mark Bieter\*  
Bradley Prowant\*  
STOEL RIVES LLP  
760 SW Ninth Avenue, Suite 3000  
Portland, Oregon 97205  
Telephone: (503) 224-3380  
Fax: (503) 220-2480

Sean Lyons  
State Bar No. 00792280  
Clem Lyons  
State Bar No. 12742000  
LYONS & LYONS, P.C.  
237 W. Travis Street, Suite 100  
San Antonio, Texas 78205  
Telephone: (210) 225-5251  
Fax: (210) 225-6545  
Sean@lyonsandlyons.com  
Clem@lyonsandlyons.com

Courtney Hostetler\*  
Ron Fein\*  
John Bonifaz\*  
Ben Clements\*  
FREE SPEECH FOR PEOPLE  
1320 Centre Street, Suite 405  
Newton, Massachusetts 02459  
Telephone: (617) 249-3015  
chostetler@freespeechforpeople.org  
rfein@freespeechforpeople.org  
jbonifaz@freespeechforpeople.org  
bclements@freespeechforpeople.org

*Attorneys for Plaintiffs Mi Familia Vota,  
Marla López, Marlon López, and Paul  
Rutledge*

Marc E. Elias\*  
Uzoma N. Nkwonta\*  
Haley Costello Essig\*  
Graham W. White\*

Noah B. Baron\*  
Michael B. Jones\*  
Marcos Mocine-McQueen\*  
ELIAS LAW GROUP LLP  
10 G Street NE, Suite 600  
Washington, DC 20002  
Telephone: (202) 968-4490  
melias@elias.law  
unkwonta@elias.law  
hessig@elias.law  
gwhite@elias.law  
nbaron@elias.law  
mjones@elias.law  
mmcqueen@elias.law

John R. Hardin  
Texas State Bar No. 24012784  
PERKINS COIE LLP  
500 North Akard Street, Suite 3300  
Dallas, Texas 75201-3347  
Telephone: (214) 965-7700  
Facsimile: (214) 965-7799  
johnhardin@perkinscoie.com

*Counsel for Plaintiffs LULAC Texas, Voto  
Latino, Texas Alliance for Retired  
Americans, and Texas AFT*

Domingo Garcia  
Texas State Bar No. 07631950  
LAW OFFICE OF DOMINGO GARCIA  
PC  
1111 West Mockingbird Lane, Suite 1200  
Dallas, Texas 75247-5012  
Telephone: (214) 941-8300  
dgarcia@lulac.org

*Counsel for Plaintiff LULAC Texas*

*\* Admitted pro hac vice  
+ Mailing address only. Work remotely  
from, and admitted to practice in, Georgia.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on April 18, 2022, the foregoing document was served via e-mail to all counsel of record.

/s/ Jasleen K. Singh  
Jasleen K. Singh